

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: GLENN E. NASK : CHAPTER 13
:
DEBTOR : CASE NO. 16-127987 ELF

**DEBTOR'S ANSWER TO
MOTION OF BANK OF NEW YORK MELLON as trustee FOR RELIEF FROM STAY**

1. Denied that plaintiff is the trustee of said trust.

2. Admitted.

3. Denied.

4. - 5. Admitted.

6. Denied. By way of further answer, it is denied that the amount of the post petition payments is \$1,897.35 each. To the contrary, there is a loan modification between the parties with which movant has refused to comply. Debtor had made, and movant accepted, several payments under the modification.

7. Denied that movant is entitled to any counsel fees.

8. Denied.

9. Denied. Debtor has made additional payments to the trustee.

10. Denied. By way of further answer, movant failed to include the loan modification in the attachments.

11. Denied as a conclusion of law and ultimate fact not supported by the actual facts.

12. Denied as a request for future declaratory relief which is speculative and unsupported.

WHEREFORE, Debtors request your honorable court to deny the said Motion.

Respectfully submitted,

/s/ Joseph F. Claffy
Joseph F. Claffy, Esquire
Attorney for Debtor